

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOSEPH BOOK,
Plaintiff

VS

STATE TROOPER KURT M.
FERRAZANNI, STATE TROOPER SMITH,
STATE TROOPER MCKENZIE, AND
STATE TROOPER HENNIGAN
Defendants

NO. 04-CV11557

DEFENDANTS' PROPOSED VOIR DIRE

Defendants request that the following voir dire questions be asked of the jury.

1. Have you, any family member, or any close friend ever been charged with operating a motor vehicle while under the influence of alcohol?

2. Have you or any member of your family or any close friend ever been arrested?
If so, what were the circumstances of the arrest and how was the matter disposed of?

3. Have you or any member of your family or any close friend ever had any experience that you considered negative in dealing with law enforcement agents? If yes, will that experience in any way affect your judgment of the facts of this case?

4. Have you or any member of your family or any close friend ever been the subject of a police investigation that you believed involved a false accusation or a violation of any civil or constitutional rights? If so, how do you believe the police conducted themselves during the investigation?

5. As a result of any contact or experience with police officers do you harbor any ill feelings towards police as a profession?

6. Have you or any member of your family or any close friend ever been a Plaintiff in a lawsuit?

7. If you or any members of your family or a close friend have been a Plaintiff in a lawsuit, what was the subject matter and outcome of the lawsuit?

8. Do you or any member of your family belong to any civic, political or any other organization that is concerned with civil rights or liberties reform (i.e., civil liberties union)? If so, please name and describe the organizations and the degree of your participation in such organizations.

9. Have you or any member of your family been a juror in a case involving an allegation of police misconduct?

10. Do you for any reason have any negative opinion of police officers or other law enforcement agents?

Respectfully submitted,

Defendant Kurt Ferrazanni
By his counsel,

/s/ Brian Rogal

Brian Rogal, Esquire
BBO No. 424920
160 Gould Street, Suite 111
Needham, MA 02494
781-455-8964

Defendants McKenzie, Smith and
Hennigan,
By their counsel,

/s/ Timothy Burke

Timothy Burke, Esquire
BBO No. 065720
160 Gould Street, Suite 111
Needham, MA 02494
781-455-0707

Certificate of Service

Service is made via the Court's ECF notification system.